

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

LYM DEVELOPMENT, LLC,¹

Debtor.

Chapter 11

Case No. 23-11435-pmm

**APPLICATION OF KELLER WILLIAMS PHILLY SOUTH TO APPROVE REALTOR
COMPENSATION RELATING TO THE SALE OF 2255 GREENWICH STREET,
PHILADELPHIA, PA**

1. Debtor filed for protection under Chapter 11, Subchapter V on May 17, 2023.
2. Debtor owns several properties including 2255 Greenwich Street, Philadelphia, PA.
3. The debtor filed an application to appoint Keller Williams Philly South (“KWPS”) and an Order was entered on June 1, 2023, approving their appointment.
4. The realtor’s listing Agreement for the Property is attached as Exhibit A.
5. Said Realtor procured a buyer, and an Agreement of Sale was Executed on July 8, 2023. The Agreement of Sale is attached as Exhibit B.
6. An Expedited Motion to Approve the Sale was filed with the Court on July 17, 2023.
7. This Application is being filed in conformity with in Re: Busy Beaver Building Centers, Inc., 19 F.3d 33 (3d Cir. 1994).
8. The sale of the real estate will generate gross proceeds in the amount of \$307,000.00, subject to closing costs and adjustments. Pursuant to 11 U.S.C. § 330 and

¹ If applicable, the last four digits of the taxpayer identification number of the Debtor is 0893 and the Debtor’s address is 200 Davistown Rd., Blackwood, NJ 08012.

Fed.R.Bank. P. 2016, KWPS requests Compensation in the amount of \$18,420.00 which represents 6% of \$307,000.00.

9. Any fees awarded will be paid directly at any closing.

WHEREFORE Applicant respectfully requests the entry of an Order in the form attached hereto, awarding \$18,420.00 in compensation pursuant to the terms of the listing agreement and Court Order employing KWPS.

Dated: 7/17/2023 | 3:15 PM PDT

KELLER WILLIAMS PHILLY SOUTH

By: 
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